

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

MATTHEW C. ZORN,

Plaintiff,

v.

U.S. DEPARTMENT OF JUSTICE, *et al.*,

Defendants.

Civil Action No. 4:22-CV-02396

**DEFENDANTS' UNOPPOSED MOTION TO EXTEND TIME TO FILE
OPPOSITION TO PLAINTIFF'S MOTION FOR SUMMARY
JUDGMENT AND CROSS-MOTION FOR SUMMARY JUDGMENT**

Defendants U.S. Department of Justice, *et al.*, respectfully move for a seven-day extension of the deadline to file Defendants' combined summary judgment motion and opposition to Plaintiff's summary judgment motion in this case. The current deadline is October 30, 2024. ECF No. 107. Defendants seek an extension until November 6, 2024. Counsel for Defendants conferred with Plaintiff who stated that he does not oppose the requested extension.¹

Good cause supports this Motion. The attorney with primary drafting responsibility for Defendants' summary judgment filing had planned to devote most of this week to the filing. However, that attorney became ill and was out of the office for part of the week. In addition, the attorney has other deadlines and litigation commitments in the coming weeks, including ongoing expedited discovery in a complex First Amendment dispute. Accordingly, additional time will be necessary to draft Defendants' summary judgment filing.

¹ As Defendants informed Plaintiff, Defendants will agree to an extension of Plaintiff's November 20, 2024 briefing deadline. Defendants understand that Plaintiff will wait to see Defendants' summary judgment filing before seeking to extend the November 20 deadline.

For these reasons, Defendants respectfully seek a seven-day extension of time until November 6, 2024 to file Defendants' combined summary judgment motion and opposition to Plaintiff's summary judgment motion.

DATED: October 25, 2024

Respectfully Submitted,

s/Jimmy A. Rodriguez
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Attorneys for Defendants

CERTIFICATE OF CONFERENCE

Defendants have conferred with Plaintiff about this motion and Plaintiff is not opposed.

s/ Joshua Kolsky
Joshua Kolsky
Senior Trial Counsel

CERTIFICATE OF SERVICE

I certify that on October 25, 2024, a true and correct copy of the foregoing was filed with the United States District Clerk for the Southern District of Texas and electronically served on all counsel of record via the District's ECF system.

s/ Joshua Kolsky
Joshua Kolsky
Senior Trial Counsel